

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RIDGEWOOD WATER,

Plaintiff,

against

3M COMPANY, E.I. DUPONT DE NEMOURS & COMPANY, THE CHEMOURS COMPANY, HONEYWELL INTERNATIONAL INC., TYCO FIRE PRODUCTS LP, CHEMGUARD, INC., BUCKEYE FIRE EQUIPMENT COMPANY, NATIONAL FOAM, INC., AND DOES 1-50, INCLUSIVE,

Defendants.

Civil Action

Index No.: 2:19-cv-9651 (JMV) (JAD)

**STIPULATION EXTENDING TIME
TO RESPOND TO COMPLAINT**

IT IS HEREBY STIPULATED by and between the parties and their undersigned counsel that the time for Defendants 3M Company, E.I. Dupont De Nemours & Company, The Chemours Company, Honeywell International Inc., Tyco Fire Products LP, Chemguard, Inc., Buckeye Fire Equipment Company, and National Foam, Inc. to answer, move, or otherwise respond to the Complaint filed by Plaintiff Ridgewood Water on February 25, 2019, be and hereby is extended through and including the 30th day after a decision is made to remand this matter to State Court or to transfer this matter to the pending Multidistrict Litigation, whichever is earlier. If this matter is neither remanded to State Court nor transferred to the pending Multidistrict Litigation, the parties agree to meet and confer to discuss a deadline for Defendants to answer, move, or otherwise respond to the Complaint.

Dated: April 17, 2019

<p><u>/s/ Matthew S. Rogers</u> Matthew S. Rogers, Esq. LAW OFFICERS OF MATTHEW S. ROGERS, L.L.C. 123 Prospect Street Ridgewood, New Jersey 07450 msr@mrogerslaw.com</p> <p>Victor M. Sher, Esq. Matthew K. Edling, Esq. SHER EDLING LLP 100 Montgomery Street, Suite 1410 San Francisco, CA 94104 vic@sheredling.com</p> <p><i>Attorneys for Plaintiff Ridgewood Water</i></p>	<p>By: <u>/s/ Thomas J. Herten</u> Thomas J. Herten, Esq. Nicole G. McDonough, Esq. ARCHER & GREINER P.C. Court Plaza South, West Wing 21 Main Street, Suite 353 Hackensack, NJ 07601 201.498.8502 therten@archerlaw.com nmcdonough@archerlaw.com</p> <p><i>Attorneys for Defendants Tyco Fire Products LP and Chemguard, Inc.</i></p>
<p><u>/s/ Donald J. Cameron</u> Donald J. Cameron, II, Esq., BRESSLER, AMERY & ROSS, P.C. 325 Columbia Turnpike, Suite 301, Florham Park, NJ 07932 973.514.1200 djcameron@bressler.com</p> <p>Jordan D. Sagalowsky, Esq. MAYER BROWN LLP 1221 Avenue of the Americas, New York, NY 10020 212.506.2500 jsagalowsky@mayerbrown.com</p> <p><i>Attorneys for 3M Company</i></p>	<p><u>/s/ Ellen Nunno Corbo</u> Ellen Nunno Corbo, Esq., TAYLOR COLICCHIO, LLP 100 Canal Pointe Blvd., Suite 125 Princeton, New Jersey 08540 ecorbo@tcslawyers.com</p> <p><i>Attorneys for Buckeye Fire Equipment Company</i></p>

<p><u>/s/ John M. Fietkiewicz</u> John M. Fietkiewicz, Esq. ARNOLD & PORTER KAYE SCHOLER LLP One Gateway Center, Suite 1025 Newark, NJ 07102 973.776.1900 John.fietkiewicz@arnoldporter.com</p> <p><i>Attorneys for Honeywell International Inc.</i></p>	<p><u>/s/ KaSandra Rogiers</u> KaSandra Rogiers NJ Bar #033802009 SHOOK, HARDY & BACON, L.L.P. 2001 Market Street Philadelphia, PA 19103 215.575.3125 krogiers@shb.com</p> <p>John K. Sherk III, Esq. SHOOK, HARDY & BACON L.L.P. One Montgomery Street Suite 2600 San Francisco, CA 94104 415.544.1900 jsherk@shb.com</p> <p><i>Attorneys for E.I. Dupont De Nemours & Company and The Chemours Company</i></p>
<p><u>/s/ Keith E. Smith</u> Keith E. Smith, Esq., GREENBERG TRAURIG, LLP 1717 Arch Street, Suite 400 Philadelphia, PA 19103 215.988.7843 smithkei@gtlaw.com</p> <p><i>Attorneys for National Foam, Inc.</i></p>	

SO ORDERED

Hon. Joseph A. Dickson, U.S.M.J.

Dated: _____